

STROOCK & STROOCK & LAVAN LLP
Claude Szyfer
Francis C. Healy
180 Maiden Lane
New York, New York 10038
Telephone: (212) 806-5400
Facsimile: (212) 806-6006

*Attorneys for DZ Bank AG Deutsche
Zentral-Genossenschaftsbank*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re)	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <u>et al.</u> ,)	Case No. 08-13555 (JMP)
Debtors.)	Jointly Administered
)	

**NOTICE OF WITHDRAWAL OF NOTICE OF INTENT
TO PARTICIPATE IN DISCOVERY RELATED TO PLAN CONFIRMATION**

PLEASE TAKE NOTICE that DZ Bank AG Deutsche Zentral-Genossenschaftsbank (“DZ Bank”) is hereby withdrawing without prejudice its Notice of Intent to Participate in Discovery Related to Plan Confirmation (the “Notice of Intent”), which was served on April 28, 2011 in accordance with the Order Establishing Procedures in Connection with Discovery Related to Plan Confirmation and Other Issues, entered by the Court on April 14, 2011 [Docket No. 16003] (the “Order”). A copy of the Notice of Intent is attached hereto as Exhibit A. DZ Bank has not accessed any Confidential Information (as defined in the Order) but reserves its right to seek all appropriate discovery that is permitted pursuant to the Order, the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and any other applicable provisions of law.

Dated: June 13, 2011

STROOCK & STROOCK & LAVAN LLP

/s/ Claude Szyfer

Claude Szyfer
Francis C. Healy
180 Maiden Lane
New York, New York 10038
Tel: (212) 806-5400
Fax: (212) 806-6006

*Counsel to DZ Bank AG Deutsche Zentral-
Genossenschaftsbank*

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- x
In re: : **Chapter 11**
:
LEHMAN BROTHERS HOLDINGS INC., et al., : **Case No. 08-13555 (JMP)**
:
Debtors. : **(Jointly Administered)**
:
----- x

**NOTICE OF INTENT TO PARTICIPATE IN DISCOVERY RELATED TO PLAN
CONFIRMATION**

NOTICE IS HEREBY GIVEN that DZ Bank AG Deutsche Zentral-Genossenschaftsbank (“DZ Bank”), represented by Stroock & Stroock & Lavan LLP, has filed the following claims in the above-captioned chapter 11 cases (the “Chapter 11 Cases”):

<u>Claim No.</u>	<u>Debtor</u>	<u>Claim Amount</u>
17422	Lehman Brothers Holdings Inc.	\$74,613,781.99
17423	Lehman Brothers Special Financing Inc.	\$213,525,103.75
17424	Lehman Brothers Holdings Inc.	\$213,525,103.75
17425	Lehman Brothers Holdings Inc.	\$652,975.31
17426	Lehman Brothers Holdings Inc.	\$46,109,898.40
65953	Lehman Brothers Holdings Inc.	\$810,027.65
65954	Lehman Brothers Commercial Corporation	\$810,027.65
65955	Lehman Brothers Holdings Inc.	\$18,487,213.80
65956	Lehman Brothers Commercial Corporation	\$18,487,213.80

ACCORDINGLY, PLEASE TAKE FURTHER NOTICE that, subject to any objections by the Debtors or the Statutory Committee of Unsecured Creditors appointed in the Chapter 11 Cases and/or any limitations imposed by the Court, DZ Bank and its counsel intend to participate in Plan Discovery, as defined in the Order Establishing Procedures in Connection with Discovery Related to Plan Confirmation and Other Issues, entered by the Court on April 14, 2011 [Docket No. 16003] (the “Order”).

Dated: April 28, 2011

STROOCK & STROOCK & LAVAN LLP

/s/ Claude Szyfer

Claude Szyfer

Francis C. Healy

180 Maiden Lane

New York, New York 10038

Telephone: (212) 806-5400

Facsimile: (212) 806-6006

Counsel to DZ Bank

Contact Information for DZ Bank:

DZ BANK AG
Deutsche Zentral-Genossenschaftsbank
Platz der Republik
60265 Frankfurt am Main
Germany
Telephone: +49 69 7447 90251
Facsimile: +49 69 7447 7101
Attn: Stephan Rost
Stephan.Rost@dzbanks.de

Contact Information for Attorneys for DZ Bank:

Stroock & Stroock & Lavan LLP
180 Maiden Lane
New York, New York 10038
Telephone: (212) 806-5400
Facsimile: (212) 806-6006
Attn: Claude Szyfer and Francis C. Healy
cszyfer@stroock.com
fhealy@stroock.com

Designation of Contacts to Receive Any Notice(s)
Required Under the Order:

DZ BANK AG
Deutsche Zentral-Genossenschaftsbank
Platz der Republik
60265 Frankfurt am Main
Germany
Telephone: +49 69 7447 90251
Facsimile: +49 69 7447 7101
Attn: Stephan Rost
Stephan.Rost@dzbanks.de

-and-

Stroock & Stroock & Lavan LLP
180 Maiden Lane
New York, New York 10038
Telephone: (212) 806-5400
Facsimile: (212) 806-6006
Attn: Claude Szyfer and Francis C. Healy
cszyfer@stroock.com
fhealy@stroock.com

Groups that Participant elects to join (pursuant to Paragraph 3(b) of the Order: (1) the guarantee creditors of LBHI for which a Debtor or U.S. affiliate is the primary obligor (as designated in subparagraph 3(b)(ii) of the Order); (2) the guarantee creditors of LBHI for which a non-U.S. affiliate is the primary obligor (as designated in subparagraph 3(b)(iii) of the Order); and (3) the creditors of the derivative entity debtors, including Lehman Brothers Special Financing Inc. (“LBSF”) and Lehman Brothers Commercial Corp. (“LBCC”) (as designated in subparagraph 3(b)(v) of the Order).